

## **REMARKS**

This is intended as a full and complete response to the Office Action dated July 22, 2008, having a shortened statutory period for response set to expire on October 22, 2008. Please reconsider the claims pending in the application for reasons discussed below.

Claims 12, 13 and 17 are pending in the application. Claims 12, 13, and 17 remain pending following entry of this response.

### Claim Rejections - 35 U.S.C. § 103

Claims 12-13 and 17 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Bays et al.* (US Patent 6,519,603, hereinafter "*Bays*") in view of *Wynblatt et al.* (US Patent 6,871,318).

Applicants respectfully traverse this rejection.

The Examiner bears the initial burden of establishing a prima facie case of obviousness. See MPEP § 2141. Establishing a prima facie case of obviousness begins with first resolving the factual inquiries of *Graham v. John Deere Co.* 383 U.S. 1 (1966). The factual inquiries are as follows:

- (A) determining the scope and content of the prior art;
- (B) ascertaining the differences between the claimed invention and the prior art;
- (C) resolving the level of ordinary skill in the art; and
- (D) considering any objective indicia of nonobviousness.

Once the *Graham* factual inquiries are resolved, the Examiner must determine whether the claimed invention would have been obvious to one of ordinary skill in the art.

Respectfully, Applicants submit that the Examiner has not properly characterized the teachings of the references and/or the claims at issue. Accordingly, a prima facie case of obviousness has not been established.

For example, regarding claim 12 and the claims depending therefrom, *Bays* does not disclose presenting, to the user, a plurality of annotation structures based on the selected role and the set of identifying parameters, wherein each annotation structure defines one or more annotation input fields. Examiner suggests that this claim

element is disclosed in Figures 2, 4, Column 5: Lines 25-31, Column 8: Lines 27-35, and Column 9: Lines 43-45 of *Bays*.

However, Applicants submit that on page 3 of the Office Action dated July 22<sup>nd</sup>, 2008, Examiner states that the set of identifying parameters, as claimed, are analogous to the index or object identifiers such as a relational table or spreadsheet, a row within the table, a cell within the table, and the like, as described in Column 2: Lines 29-37 of *Bays*. However, neither Figure 2, Figure 4, Column 5: Lines 25-31, Column 8: Lines 27-35, or Column 9: Lines 43-45 of *Bays* disclose that the plurality of annotation structures presented to the user are based on the index or object identifiers such as a relational table or spreadsheet, a row within the table, a cell within the table, and the like. In fact, Applicants submit that the annotation structures presented to the user in *Bays* are not based on the index or object identifiers in any way. Accordingly, Applicants submit that *Bays* does not disclose presenting, to the user, a plurality of annotation structures based on the selected role and the set of identifying parameters, wherein each annotation structure defines one or more annotation input fields.

Therefore, the claims are believed to be allowable, and allowance of the claims is respectfully requested.

Conclusion

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted, and  
**S-signed pursuant to 37 CFR 1.4,**

/Gero G. McClellan, Reg. No. 44,227/

---

Gero G. McClellan  
Registration No. 44,227  
PATTERSON & SHERIDAN, L.L.P.  
3040 Post Oak Blvd. Suite 1500  
Houston, TX 77056  
Telephone: (713) 623-4844  
Facsimile: (713) 623-4846  
Attorney for Applicant(s)